

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

WADE PARK LAND HOLDINGS, LLC; WADE  
PARK LAND, LLC; and  
THE THOMAS FAMILY TRUST, by and through  
its Trustees, acting in their official capacities,

Plaintiffs,

v.

JONATHAN KALIKOW;  
WP DEVELOPMENT PARTNERS LLC;  
GAMMA LENDING OMEGA LLC; GAMMA  
REAL ESTATE CAPITAL LLC; GRE WP LLC;  
and BLAKE GOODMAN,

Defendants.

CIVIL ACTION FILE  
NO. 1:21-cv-01657-LJL-RWL

**NOTICE OF MOTION TO AMEND  
THE JUDGMENT AND FOR  
LEAVE TO FILE A SECOND  
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Declaration of James Cobb, sworn to on March 18, 2022, and the exhibits attached thereto, and the attached Memorandum of Law in Support of Plaintiffs' Motion to Amend the Judgment and for Leave to File a Second Amended Complaint, dated March 18, 2022, and upon all of the proceedings in this case to date, Plaintiffs will move this Court, before the Honorable Lewis J. Liman, United States District Judge, either remotely or at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 15C, New York, NY 10007, on a date and time to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 15(a)(2) and 59(e) and Fed. R. Bankr. P. 7015 and 9023, amending the Judgment entered on March 7, 2022 and granting Plaintiffs leave to file a Second Amended Complaint.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), opposition papers, if any, are required to be served no later than April 1, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), reply papers, if any, are required to be served no later than April 8, 2022.

Dated: Atlanta, Georgia  
March 18, 2022

**CAPLAN COBB LLC**

/s/ James W. Cobb  
James W. Cobb (*admitted pro hac vice*)

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